

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327</b>  <b>WAVE 11</b>  <b>JOSEPH R. GOODWIN</b> <b>U.S. DISTRICT JUDGE</b>
<b>THIS DOCUMENT RELATES TO:</b>  <i>Cases Listed in Exhibit A</i>	

**NOTICE OF ADOPTION OF PRIOR MOTION TO EXCLUDE THE GENERAL  
EXPERT TESTIMONY OF BRIAN RAYBON, M.D.**

Plaintiffs served a copy of the Wave 2 Prolift +M expert report of Brian Raybon, M.D., whom they have designated as a general causation expert in this wave. Ex. B, Prolift +M Expert Report of Brian Raybon, M.D. In fact, the Wave 2 report is identical to Dr. Raybon's Wave 1 Prolift +M report, except for the caption stating to which wave the report applies. As such, Defendants hereby adopt and incorporate their prior motion (MDL Doc. 2115) and briefing (MDL Docs. 2116, 2264, 2461) as to the exclusion of Dr. Raybon's general Prolift +M opinions. For the reasons stated in the prior briefs, Dr. Raybon's testimony should be excluded. This notice applies to the Wave 11 cases identified in Exhibit A, attached hereto.

Respectfully submitted,

/s/ William M. Gage

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**CERTIFICATE OF SERVICE**

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage  
William M. Gage

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